South Coast
Air Quality Management District
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Ms. Vanessa Marie Ng
Contract Planner
County of Riverside Planning Department
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P. O. Box 1409
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Subject: FEIR 450 Mira Loma Commerce Center Third Party Review

Dear Ms. Ng:

South Coast Air Quality Management District (SCAQMD) staff has reviewed the third party review prepared by URS Corporation (URS) on the above-mentioned document. The SCAQMD staff is submitting the following comments not only on the third party comment letter dated September 13, 2005, but also on a re-evaluation of the lead agency's responses to the issues SCAQMD staff raised in the December 3, 2004 comment letter on the proposed project.

The lead agency has not responded adequately to some of the issues raised in the December 3, 2004 comment letter. Specifically, the lead agency underestimated diesel exhaust emissions from truck idling in the project area in the health risk assessment which may lead to an underestimation of the cancer risk associated with the proposed project. While diesel trucks are limited to five minutes of idling at any given time, a truck may idle more than once per visit. In addition, in response # 14.2, the lead agency states, "There are two (2) locations where both the 2006 unmitigated 70-year cancer risk (20 per million and 11 per million) exceed the significance thresholds …" This statement misrepresents the actual number of sensitive receptors exposed to significant levels of air toxics. The lead agency should clarify that each location contains multiple sensitive residential receptors. Furthermore, given the fact that the cancer risk exceeds the SCAQMD's recommended cancer risk significance threshold, SCAQMD requests that the lead agency reconsider including all recommended mitigation measures. The third party review letter states that some mitigation measures proposed by SCAQMD staff were rejected by the lead agency without explanation. The SCAQMD staff requests that the lead agency to reconsider the mitigation measures proposed in the December 3, 2004 comment letter. Specific examples are given in the attached comments.

The third party letter states that the URBEMIS 2002 results that did not represent the worst-case construction emissions due to the absence of clarity on construction scheduling and number and type of construction equipment to be used at different stages of the project. These are points SCAQMD staff made in the December 3, 2004 comment letter. The lead agency needs to be consistent in the acreages/square footage of the parcels to be developed.

SCAQMD staff recommends that the lead agency reevaluate the assumptions used for the air quality analysis and revise the health risk assessment to reflect a worst-case condition – consistent with CEQA Guidelines – in order to adequately characterize the air toxic impacts that will be generated by the proposed project.

Specific responses to the lead agency's responses to the SCAQMD's December 3, 2004 comments are attached. The SCAQMD would be happy to work with you to address the above concerns for the revised FEIR. Please contact me at (909) 396-3105 if you have any questions regarding these comments.

Sincerely,

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN:SS:JK:CB

Response 14.7

This response uses circular reasoning and is not acceptable. For example, SCAQMD staff indicated that the heavy-duty diesel emission factor, in particular the year 2007 idling factor in Appendix J-2, is not the appropriate emission factor. The lead agency's response says that this was the idling factor provided by the consultant and refers to Appendix J-2.

To provide further clarification to the SCAQMD's original comment, SCAQMD staff recommends that on-road mobile source emission factors used for air quality analyses represent fleet averages, not specific model year emission factors because fleet average emission factors tend to be more conservative. However, because the lead agency used an old model year emission factor to estimate year 2006 cancer risk, this emission factor is actually more conservative than using the year 2006 fleet average emission factor. For this particular analysis, using the model year emission factor would be acceptable. Normally this approach is less conservative and, therefore, is not recommended.

SCAQMD staff maintains that the year 2025 idling emission factor (0.15 g/hr) is not appropriate because it is substantially lower than the year 2025 fleet average emission factor of 1.024 g/hr. Therefore, the year 2025 cancer risk estimate is substantially underestimated for this project.

It is unclear, however, why the lead agency even calculated cancer risk for the year 2025. An HRA for the year the project becomes fully operational is typically sufficient unless the lead agency expects the project to expand or there are other factors that would increase the number of heavy-duty truck trips to the facility.

SCAQMD staff stated that the idling emission factor developed in Attachment H Appendix J-2 of the Draft EIR did not appear to be a fleet emission factor but a model year emission factor. SCAQMD stated that the Final EIR should include fleet year emission factor developed by EMFAC2002. The response to SCAQMD staff does not state whether or not the emission factors were developed from an average of fleet mix emission factors. The response appears to imply that the emission factors were developed by model year, which is what SCAQMD staff stated was an incorrect methodology. The response then asks the SCAQMD staff to refer to Appendix J-2, which is the section that SCAQMD staff has found deficient in its explanation of the emission factor.

SCAQMD staff requests that the Final EIR include a HRA that is based upon fleet mix emission factors developed using EMFAC2002.

Response 14.9

The lead agency continues to mischaracterize the project boundary. The proposed project consists of seven fill-in parcels in an existing industrial use area. SCAQMD staff stated that the HRA should include the existing surrounding buildings, such as Footstar, Millard, GTX, Nestle Foods, Prudential, Le Vecke Corp., International Paper and Highland Plastics. The response claims that the existing facilities are within the Mira

Loma Commerce Center and are all within the proposed project boundary. The response states that placing receptors at the existing Mira Loma Commerce Center is not consistent with the SCAQMD Health Risk Assessment Guidelines for Analyzing Cancer Risk from Mobile Diesel Idling Emission for CEQA Air Quality Analysis (Mobile HRA Guidance), August 2003.

The SCAQMD's Mobile HRA Guidance states that the 100 meter "receptor grid should begin at the facility fence line and extend to an adequate distance from the site to cover the facility's impact area." The Mobile HRA Guidance does not state that existing facilities under a common ownership should be excluded from risk estimation. Activities at the existing facilities are owned and operated by separate businesses. Since the occupants of the existing facilities are not involved in the direct decision making process of the proposed project and the owners of the Mira Loma Commerce Center are not directly responsible for the health and safety of the occupants of the existing facilities; risk from the proposed project upon the existing facilities must be quantified so that the occupants of the existing facilities can make informed decisions based upon the impacts of the proposed project upon their employees. Therefore, SCAQMD staff requests that the Final EIR quantitatively evaluate the risk to the existing facilities at the Mira Loma Commerce Center.

Response 14.11

The response states that there are two locations where both the 2006 unmitigated 70-year cancer risk (20 per million and 11 per million) and 2006 mitigated 70-year cancer risk (18 per million and 11 per million) exceeds the significance criteria of ten in a million. This statement needs to be clarified. The statement appears to say that the risk at only two single receptors exceeds the significance threshold for both the mitigated and unmitigated scenarios. The HRA shows that the risk isopleths around two areas that contain multiple residential receptors exceed 10 in one million. One area is between Plots C and D/E on the west side of those plots and the other area is east of Plot B. In both of these areas there are multiple residential receptors that would be exposed to a risk greater than 10 in one million. The Final EIR should clarify that there are multiple residential receptors that would be exposed to a risk greater than 10 in one million.

Truck Idling and Emission Factor:

The lead agency proposes to restrict truck idling to five minutes or less on site. Although this restriction is consistent with state law, it is not realistic given the time it would take for the trucks to check in, load or offload and to check out. Furthermore, the idling emission factor for 2025 is too low. It should be 1.0 g/hr rather than 0.15 g/hr.

Response 14.12: Mitigation Measures

The lead agency proposes to reduce the scale of the project in order to reduce the potential impacts due to air quality, traffic and noise. See Response 14.2 on page 80. A review of the project description and the lot summary in Table 2.1 on page 2.8 shows a nominal reduction of three to four percent in parcel and building size. Such a minor reduction in project size is expected to have negligible effects on project impacts.

Therefore, the lead agency should consider much greater reductions in the scale of the proposed project to provide meaningful reduction in air quality, traffic and noise impacts.

The lead agency also proposes to provide 70 to 170 feet buffer zones between the facility and the nearest residences. One of the recommendations in *The Good Neighbor Guidelines For Siting New and/or Modified Warehouse/Distribution Facilities* (Draft February 2005), is that there should be at least 300-meter (roughly 1,000 feet) buffer zones between the facility and sensitive receptors. SCAQMD staff recommends that this recommendation be adhered to for this project to minimize the sensitive receptors' exposure to diesel emissions from trucks that will be servicing the warehouse.